

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE: Kevin J. Faherty aka Kevin John Faherty aka  
Kevin Faherty

Debtor

Wilmington Savings Fund Society, FSB, d/b/a  
Christiana Trust, not individually but as trustee for  
Carlsbad Funding Mortgage Trust

Movant

vs.

Kevin J. Faherty aka Kevin John Faherty aka Kevin  
Faherty

Debtor

Charles J. DeHart, III

Trustee

CHAPTER 13

NO. 5:16-bk-01017-JJT

Nature of Proceeding: Motion for Relief

**REQUEST TO CONTINUE HEARING WITH CONCURRENCE**

This request must be filed at least twenty-four (24) hours prior to the hearing. All requests must be approved by the court. Submitting a request is not an automatic continuance.

The undersigned hereby requests a continuance with the concurrence of the opposing party (parties). This is a first request for a continuance.

Reason for the continuance; both parties are attempting settlement.

Contemporaneous with the filing of this request, the undersigned has served a copy of this request upon all counsel participating in this proceeding.

Dated: September 19, 2016

/s/ Joshua I. Goldman, Esquire

Joshua I. Goldman, Esquire  
Attorney for Moving Party  
BNY Independence Center  
701 Market Street, Suite 5000  
Philadelphia, PA 19106-1532  
(215) 627-1322  
Fax (215) 825-6406